

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 13cr30021-DPW
)	
ANGEL LUIS MEDINA,)	
DOEL VEGA, and)	
LUZ ENEIDA MORALES,)	
Defendants.)	

PARTIES' JOINT MEMORANDUM
PURSUANT TO LOCAL RULE 116.5(A)

The United States of America, by Carmen M. Ortiz, United States Attorney for the District of Massachusetts, and counsel for Angel Luis Medina, Oscar Cruz, Jr., Esq., Doel Vega, John Darrell, Esq., and Luz Eneida Morales, Raymond A. O'Hara, Esq., hereby file their joint memorandum pursuant to Local Rule 116.5(A):

1. The government has provided the defendants with automatic discovery. There are no pending discovery requests or discovery motions. The parties expect that any future discovery issues will be worked out between them.
2. The government has provided automatic discovery. Additional discovery, including certain impeachment information and witness statements pursuant to 18 U.S.C. § 3500, will be made in accord with the local rules.
3. The defendants do not intend to make additional discovery requests at this time. In the event that further discovery requests need to be made, the parties expect to resolve those requests between them.
4. At this time protective orders addressing the disclosure or dissemination of sensitive information concerning victims, witnesses, defendants, or law enforcement sources or techniques are not necessary.

5. The parties agree that the scheduling of Fed. R. Crim. P. 12(b) motions at this time is premature.
6. At this time, the government expects that its only expert witness will be a chemist relating to the examination of suspected controlled substances.
7. The parties agree that all of the time from today, November 12, 2013, to the date of the next status conference should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7). The parties agree that the ends of justice served by excluding this time from the Speedy Trial Act outweigh the best interests of the public and defendants in a speedy trial. The parties agree that this Speedy Trial Act exclusion is appropriate in order to allow the defendants to analyze the voluminous evidence in this case and for the parties to discuss a possible resolution of the case.
8. The parties recommend that the Court schedule a status conference before the District Court (Woodlock, J.).

Respectfully submitted,

CARMEN M. ORTIZ
UNITED STATES ATTORNEY

By: /s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney

/s/ Oscar Cruz, Jr., Esq.
Oscar Cruz, Jr., Esq.
Attorney for Angel Luis Medina

/s/ John Darrell, Esq.
John Darrell, Esq.
Attorney for Doel Vega

/s/ Raymond A. O'Hara, Esq.
Raymond A. O'Hara, Esq.
Attorney for Luz Eneida Morales

CERTIFICATE OF SERVICE

November 12, 2013

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Kevin O'Regan

Kevin O'Regan

Assistant U.S. Attorney